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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	Case No. 18-CR-00258 EJD
)	
Plaintiff,)	ADMINISTRATIVE MOTION TO FILE
)	PORTIONS OF DOCUMENTS UNDER SEAL
v.)	AND PROPOSED ORDER
)	
ELIZABETH HOLMES,)	
)	
Defendant.)	
)	
)	

NOTICE OF MOTION AND ADMINISTRATIVE MOTION

Pursuant to Local Rule of Criminal Procedure 56-1, the United States respectfully files this administrative motion for an order permitting the filing under seal of the following documents:

1. Exhibit L to the November 20, 2020 Declaration of AUSA Robert S. Leach in Support of United States' Motions *in Limine*.

2. Exhibit M to the November 20, 2020 Declaration of AUSA Robert S. Leach in Support of United States' Motions *in Limine*.

These two exhibits include years' worth of private and intimate messages between defendants. Although they do not appear to meet the criteria for sealing, the government out of an abundance of caution is filing them under seal so that the Court may assess the propriety of sealing.

DATED: November 20, 2020

Respectfully submitted,

STEPHANIE M. HINDS
Attorney for the United States,
Acting Under Authority Conferred
By 28 U.S.C. § 515

/s/ Robert S. Leach

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~~PROPOSED~~ ORDER


The Court, having considered the government's Administrative Motion, hereby GRANTS the motion and ORDERS that the following documents shall be filed under seal:

1. Exhibit L to the November 20, 2020 Declaration of AUSA Robert S. Leach in Support of United States' Motions *in Limine*.
2. Exhibit M the November 20, 2020 Declaration of AUSA Robert S. Leach in Support of United States' Motions *in Limine*.

Exhibits L and M appear to be the same document as Exhibit 1N to the Declaration of Vanessa Baehr-Jones in Support of United States' Opposition to Defendant Ramesh "Sunny" Balwani's Motion to Sever (Dkt. No. 314). Accordingly, the Court GRANTS the government's motion to seal for the same reasons described in the Court's August 28, 2021 Order ordering that the Baehr-Jones declaration and its exhibits remain provisionally partially sealed (Dkt. No. 965).

IT IS SO ORDERED.

Dated: September 27, 2021



THE HONORABLE EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE